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*Counsel to Fisker Automotive, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et</i>	:	Case No. 09-50026 (REG)
<i>al.</i> , f/k/a General Motors Corp., <i>et al.</i> ,	:	
	:	
Debtors.	x	
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**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE OF NOTICES AND DOCUMENTS**

TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE:

PLEASE TAKE NOTICE that the undersigned appears as counsel to Fisker Automotive, Inc. (“**Fisker**”), a party-in-interest herein and, pursuant to 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure 2002 and 9010(b), hereby requests that all notices given or required to be given in this case be given and served upon:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, formal or informal, and whether transmitted or conveyed by mail, hand delivery, facsimile transmission, e-mail, telephone, telegraph, telex or otherwise, which affects the above-captioned Debtors or the property of or in the possession, custody or control of the Debtors or which is otherwise filed or given with regard to the above-referenced case or in any adversary proceeding or contested matter therein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right of Fisker: (1) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or

discretionary withdrawal, or (4) to contend that jurisdiction or venue in this Court is improper or inappropriate.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Notices and Documents is without prejudice to Fisker's rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or in equity, against the Debtors and any other entities either in this case or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: June 8, 2010  
New York, New York

**ORRICK, HERRINGTON & SUTCLIFFE LLP**

By: /s/ Richard H. Wyron  
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